

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA §
§
VS. §
§
CHARLES QUINTARD BEECH, III §

No. 4:17-cr-00006

DEFENDANT, CHARLES QUINTARD BEECH III'S, AMENDED UNOPPOSED MOTION TO TRAVEL

TO THE HONORABLE GRAY H. MILLER, UNITED STATES DISTRICT JUDGE:

Charles Quintard Beech III, Defendant, moves this Honorable Court to permit him to travel to New York City to visit family. In support of his motion, Defendant would show the Court the following:

Defendant will be traveling by plane to New York City to visit family. Assuming the Court approves this unopposed Motion, Defendant is leaving Tuesday, July 3, and returning to Texas on Saturday, July 7, 2018.

Defendant has demonstrated his dependability while on bond in this case since January 10, 2017. Defendant's counsel contacted the case agent, Derek Matthews, and he has no objections to this Motion.

PRAYER

Defendant prays that the Court will grant his Motion in all respects.

Respectfully submitted,
HILDER & ASSOCIATES, P.C.

/s/ Stephanie K. McGuire
Philip H. Hilder
State Bar No. 09620050
SD TX No. 2474
Stephanie K. McGuire – Counsel
State Bar No. 11000520
SD TX No. 437432
819 Lovett Blvd.
Houston, Texas 77006-3905
Telephone (713) 655-9111
Facsimile (713) 655-9112

**ATTORNEYS FOR DEFENDANT,
CHARLES QUINTARD BEECH III**

CERTIFICATE OF CONFERENCE

On June 29, 2018, I communicated via email with Assistant United States Attorney Sarah Edwards regarding this *Motion to Travel*, and she indicated that she is unopposed.

/s/ Stephanie K. McGuire
Stephanie K. McGuire

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of July 2018, a true and correct copy of the above and foregoing *Motion to Travel* was forwarded to all counsel of record via ECF, certified mail, return receipt requested, facsimile and/or hand delivery.

/s/ Stephanie K. McGuire
Stephanie K. McGuire